Sandra L. Wagner
Director
Federal Regulatory

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005
Phone 202 326-8860

SBC

April 23, 1996

Ex Parte

APR 2 3 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W., Room 222
Washington, D.C. 20554

Re: **SWBT's CEI Plan for PC Backup and Recovery**
       (CC Docket Nos. 85-229, 90-623, 95-20)

Dear Mr. Caton:

Per discussion with members of the Policy and Program Planning Division staff
of the Common Carrier Bureau, Southwestern Bell Telephone Company (SWBT)
hereby provides supplemental information to its PC Backup and Recovery
Service CEI Plan that was filed with the Commission on August 3, 1995.

At present, it is not technically feasible for SWBT to offer SmartTrunk Service in
the Federal Access Tariff. SmartTrunk Service is the underlying basic service
utilized by SWBT in the provision if its PC Backup and Recovery Service. As
expressed in SWBT's ex parte letter dated January 11, 1996, SmartTrunk
Service is SWBT's Integrated Services Digital Network Primary Rate Interface
(ISDN-PRI) local service offering. This service offering was designed based on
the standards outlined in International Telecommunication Union - T 1.412,
Section 4.1.2 which defines PRI (i.e., SWBT's SmartTrunk Service) to be only a
"user-network" interface consisting of 23 B channels plus a single D-channel
operating at 64 kbps (see attached technical standards). Because PRI was
designed to only exist between the end-office and the user's termination point,
there is no "network-network" interface and thus no interoffice services
associated with PRI.

If a service were to be provided using PRI on an interoffice basis then the
Primary Rate Interface North American and International Telecommunications
Union - T standards would need to be rewritten to include the requirements to
interconnect a PRI between two networks (i.e., network to network interfaces).
For this reason, it is not technically feasible for PRI (or SWBT's SmartTrunk
service) to be offered out of the Federal Access Tariff (i.e., SWBT's FCC Tariff
No. 73).

We believe our position is further supported by the fact that SWBT has no "user-network" interface services filed in the Federal Switched Access Tariff and those that do exist in other federal tariffs are technologically different from SmartTrunk service. For instance, although MicroLink II and Frame Relay are tariffed in the Federal Packet Switched Access Tariff, they are technologically different than the SmartTrunk Service offering. MicroLink II is a packet switching service that utilizes X.25 for transmission of data over digital facilities. MicroLink II uses a totally different numbering plan from the Public Switched Telephone Network ("PSTN") known as the ITU-T X.121 numbering plan. This differs from SmartTrunk service which uses the ITU-T E.164 numbering plan, Q.931 protocol and switches both voice and data grade services over the common PSTN.

Frame Relay is a non-switched service using Permanent Virtual Circuits similar to Private Line facilities. It differs from SmartTrunk in that 1) it does not use any numbering plan and 2) because SmartTrunk is a circuit switched service.
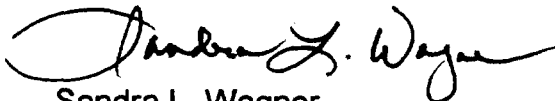
Furthermore, to the best of our knowledge, no other RBOC has filed any Federal Tariffs based upon the ISDN-PRI standard.

SWBT does offer a standards based "network-network" interface using Signaling System 7 (SS7) which is provided by Feature Group D 64K clear channel capacity. This Feature Group D service provides the technical equivalent of PRI on a "network-network" basis.

SWBT also wishes to inform the Commission that, since our November 2, 1995 ex parte meeting, the decision has been made to deploy PC Backup and Recovery on an integrated basis. Therefore, as mentioned in our letter dated November 22, 1995, the CEI requirements outlined in the respective plan will apply.

If there are any questions regarding the information provided in this letter, or other questions regarding SWBT's pending CEI plans, please feel free to contact me on 326-8860.

Sincerely,

Sandra L. Wagner

cc: Rose Crellin
     Blaise Scinto
     Radhika Karmarkar

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THE INTERNATIONAL
TELEGRAPH AND TELEPHONE
CONSULTATIVE COMMITTEE

RED BOOK

VOLUME III — FASCICLE III.5

INTEGRATED SERVICES DIGITAL NETWORK (ISDN)

RECOMMENDATIONS OF THE SERIES I

VIIIᵀᴴ PLENARY ASSEMBLY
MALAGA-TORREMOLINOS, 8-19 OCTOBER 1984

4.1.1.2 The B channels may be used independently; i.e. in different connections at the same time.

4.1.1.3 With the basic interface structure, two B channels and one D channel are always present at the ISDN user-network physical interface. One or both B channels, however, may not be supported by the network. See Appendix I.

Note — The basic interface structure may also be used in association with a conventional analogue channel in a hybrid access arrangement; see § 5.2.

4.1.2 *Primary rate B channel interface structures*

These structures correspond to the primary rates of 1544 kbit/s and 2048 kbit/s.

4.1.2.1 The primary rate B channel interface structures are composed of B channels and one D channel. The bit rate of this D channel is 64 kbit/s.

4.1.2.2 At the 1544 kbit/s primary rate the interface structure is 23 B + D.

4.1.2.3 At the 2048 kbit/s primary rate the interface structure is 30 B + D.

4.1.2.4 With the primary rate B channel interface structures, the designated number of B channels is always present at the ISDN user-network physical interface. One or more of the B channels may not be supported by the network.

4.1.2.5 In the case of a user-network access arrangement containing multiple interfaces, it is possible for the D channel in one structure to carry the signalling for B channels in another primary rate structure without an activated D channel. When a D channel is not activated, the designated time slot may or may not be used to provide an additional B channel, depending on the situation e.g., 24 B for a 1544 kbit/s interface.

4.1.3 *Alternative primary rate interface B channel structure*

4.1.3.1 In the case of a type of NT2 which would typically be connected to the ISDN by more than one primary rate access interface, it might be desirable in certain situations to employ the signalling network capabilities of CCITT Signalling System No. 7. In such a case the alternative primary rate interface B channel structures described below could be used, although the primary rate interface B channel structures defined in § 4.1.2 are preferred.

4.1.3.2 The alternative primary rate interface B channel structures are composed of B channels and one E channel.

4.1.3.3 At the 1544 kbit/s primary rate the interface structure is 23 B + E.

4.1.3.4 At the 2048 kbit/s primary rate the interface structure is 30 B + E.

4.1.3.5 With the alternative primary rate interface B channel structures the designated number of B channels is always present at the ISDN user-network physical interface. One or more of the B channels may not be supported by the network.

4.1.3.6 It is possible for the E channel of one alternative primary rate interface structure to carry the signalling for B channels in another primary rate interface B channel structure without an activated E channel. When an E channel is not activated, the designated time slot may or may not be used to provide an additional B channel; e.g. 24 B for a 1544 kbit/s interface.

4.2 *H channel interface structure*

4.2.1 *Primary rate interface H0 channel structures*

4.2.1.1 The primary rate interface H0 channel structures are composed of H0 channels with or without a D channel, as indicated below. When present in the same interface structure the bit rate of the D channel is 64 kbit/s. Additional primary rate interface H0 channel structures are for further study.

4.2.1.2 At the 1544 kbit/s primary rate interface the H0 channel structures are 4 H0 and 3 H0 + D. The use of the additional capacity across the interface is for further study. When the D channel is not provided, signalling for the H0 channels is provided by the D channel in another interface.